



Policy on Human Rights

July 2024

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About this Policy

Persistent Systems Limited (the 'Company' or 'Persistent') believes that human rights are a fundamental value for the Company. As a business, we realise the importance of our participation in the long-term protection and practice of human rights in society. Persistent is aware of the need to ensure that human rights are upheld across the Company and its entire value chain.

Purpose

Persistent believes in committing to and recognising all internationally recognised human rights statutes that are relevant to its business. The Human Rights Policy is aligned with the principles of the United Nations Global Compact (UNGC), Sustainable Development Goals (SDGs), United Nations Guiding Principles on Business and Human Rights (UNGPs), Universal Declaration of Human Rights (UDHR) and the International Labor Organization's (ILO) Declaration of Fundamental Principles and Rights to work and provides protection as per the law of the land.

Scope

Persistent shall ensure that the constituents of this policy are upheld across all operations. This policy applies to the Company, subsidiary companies (including step-down subsidiaries), associate companies, and facilities that Persistent manages. Persistent also expects suppliers and vendors, partners, and customers to adhere to these principles and adopt similar or equivalent policies in their businesses. Human rights are extremely essential for employees, workers, shareholders, investors, customers, suppliers, communities where Persistent operates, and civil society associations.

Constituents of the policy

1.\ Freedom of Association and Collective Bargaining

Persistent shall maintain our employees' right to enter, join, form, or not enter, join, or form any labor union, free of any intimidation, fear, or harassment as per the law of the land in the countries where we operate. Persistent shall remain committed to maintaining transparent communication with freely chosen representatives of any employees who represent a legally recognised union. Persistent shall be committed to bargaining limited to good faith with these representatives.

2.\ Workplace safety and security

Persistent is committed to maintaining a safe workplace, free from but not limited to mental harassment, sexual harassment, intimidation of any form, and other unsafe or threatening conditions arising from internal or external conditions, at all its locations.

Persistent maintains compliance with the highest applicable health and safety regulations and standards based on our internal requirements. Persistent maintains a record of identified risks, accidents, injuries, and other health impacts at the workplace through employee consultation and input. [Environment, Health and Safety Policy](#), [Anti-Harassment Policy](#)

3.\ Data Privacy and Protection

The Persistent Privacy Policy delineates the company's objectives concerning privacy management and underscores management's unwavering commitment to privacy protection. The application of this policy is mandatory for all group companies, business lines, subsidiaries, and affiliates, including all operations performed on personal data. All employees (past, present and future) and third-party entities (Suppliers, Vendors, etc.) associated with Persistent are obligated to adhere to the [Privacy Policy](#). Persistent's Privacy Information Management System (PIMS) is certified for ISO 27701. We provide internal training to employees and contractors, which outlines and raises awareness regarding the main standards and principles that should be followed regarding personal data and how it is handled.

The role of Privacy Officer is designated to the Data Protection Officer (DPO), who reports to the Chief Information Security Officer (CISO) and with a dedicated Privacy team serves as both architect and overseer of Data Privacy compliance in driving requirements of regulations such as the General Data Protection Regulation (GDPR), California Consumer Privacy Act (CCPA), Digital Personal Data Protection Act (DPDPA) and other applicable privacy regulations. Periodic independent audits are conducted to verify the efficacy of our data privacy measures. Ongoing Senior Management reviews, ensure thorough oversight of our privacy practices.

4.\ Human Trafficking, Child labor, and Forced labor

Persistent is strictly against all forms of forced labor, comprising prison labor, indentured labor, bonded labor, military labor, and modern forms of slavery. Persistent strictly does not follow or adapt to any form of human trafficking and are against any such activities with zero-tolerance against any such identified activities.

Persistent is strictly against the hiring of individuals below 18 years of age for any positions across our business operations and supply chain.

5.\ Enabling Employees

- \ Inclusion – Persistent is committed to promote diverse views and perspectives and does not discriminate based on age, race, national origin, ethnicity, cultural and geographical

background, gender, sexual orientation, religion, marital status, any medical conditions, or any other personal or physical aspect. Persistent believes in being an Equal Opportunity Employer.

- \\ Remuneration - Persistent believes in creating and sustaining a work culture that encourages employee retention. Persistent is committed to ensuring that our employee compensation upholds the mandates of the Equal Employment Policy (equal pay for equal work) and that remuneration is maintained at competitive levels. Persistent also ensures that all compensation structures are in line with collective bargaining agreements when applicable.
- \\ Benefits - Persistent is committed to ensuring that its employees are provided applicable compensation, relevant industry work hours, overtime benefits, and other benefits applicable according to the company policy and regulatory requirements, which include but are not limited to hybrid work, parental leave, sabbatical, time off for corporate social responsibility and paid time off.
- \\ Career and Personal Development – Persistent University offers a range of training programs to support and empower our workforce with skills that are at par with the industry. All our employees, including part-time and contractors, have access to competency development programs that are relevant for their role in the organization.

6.\\Community Engagement

We actively engage with the communities where we operate, seeking to positively contribute to their well-being and development. We respect the rights and cultures of local communities, collaborating with them in a manner that promotes inclusivity, respect, and mutual benefits.

7.\\Supply Chain

Our commitment to Human Rights extends all the way through our entire supply chain. Our policies mandate that our suppliers adhere to fair labor practices, provide safe working conditions, and respect the rights of their employees across their supply chain.

Conducting Human Rights Due Diligence Assessment

Persistent is committed to upholding human rights in all our operations, including those of our employees, contractors, and suppliers. We have a comprehensive risk management process in place to identify and mitigate potential risks in our operations and value chain or other activities related to our business, including new business relations such as mergers, acquisitions, and joint ventures etc., and regularly review our performance. We have a systematic periodic review of the risk mapping of potential issues. We have the relevant preventive, detective, and corrective controls in place to enable us to take timely actions to address, prevent, and manage human

rights violations within our own operations and value chain. We also expect our suppliers to respect human rights when providing goods and services to our company.

Grievance redressal

All the complaints received by Persistent (internal and external) are looked into, as per our policy guidelines and mandated norms. Persistent is committed to taking remediation action as required. We are committed to being respectful towards all, with zero tolerance towards acts of human rights violations or abuse (as stated in our Ethics Policy). Our grievance redressal mechanism enables employees, contractors, vendors and service providers, trainees, interns to raise grievances for various categories as stated in the following policies such as the Whistleblower Policy, Anti-Harassment Policy, Anti-Human Trafficking Policy that provide a clear structure of confidentiality and safety for all. For any concerns, please contact ahc@persistent.com.

Review of the Policy

The policy has been approved by the Board of Directors and will be reviewed at least annually by the owners of this policy viz, People & Org Development. This policy and its stakeholders will be governed by the Stakeholders Relationship Committee and ESG Committee of the Board. The People & Org Development will consult the above Committee for proposed changes if any, in its periodical review.

About Persistent

We are a trusted Digital Engineering and Enterprise Modernization partner, combining deep technical expertise and industry experience to help our clients anticipate what's next. Our offerings and proven solutions create a unique competitive advantage for our clients by giving them the power to see beyond and rise above. We work with many industry-leading organizations world-wide including 14 of the 30 most innovative US companies, 80% of the largest banks in the US and India, and numerous innovators across the healthcare ecosystem. Our company fosters a values-driven and people-centric work environment. Our strength of over 22,500+ employees is spread over 18 different countries across the globe.

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